

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Carrier Oversight & Programs Branch**

**RESOLUTION T-17670
November 7, 2019**

RESOLUTION

**Resolution T-17670. Advice Letter, Annual Tariff, and Annual
Report Filing Process Revision.**

SUMMARY

This Resolution modifies the Communications Division's Advice Letter filing process to eliminate the CD-ROM¹ and hard copy filing requirements; and implements electronic only filing. This Resolution also extends and revises the electronic filing process for Annual Tariffs and Annual Reports.² Finally, this Resolution authorizes Staff to make future similar changes and inform carriers via Administrative Letters emailed to carriers and posted on the California Public Utilities Commission (CPUC or Commission) public website.

BACKGROUND

The Advice Letter process is an informal process that enables the Commission to approve, authorize, or allow other relief relating to requests by a carrier subject to the jurisdiction of the Commission which are typically ministerial and noncontroversial. Advice Letters are submitted in compliance with Commission Decisions, Resolutions and General Orders, to modify carrier information, file an agreement, or to request approval of changes in rates, charges, terms, or conditions from those in the company's current tariff.

General Order 96-B governs matters submitted to the Commission outside a formal proceeding including submission of Advice Letters by carriers subject to the jurisdiction of the Commission. General Order 96-B includes General Rules applicable to

¹ CD-ROM is a compact disc used as a read-only optical memory device for a computer system.

² Annual Report filings include the following: FCC ARMIS Reports, Affiliated Transaction Report, Selected Financial Data, Annual Report on Operations using the FCC Form M format, and the Operational and Financial Information Report.

telecommunications carriers, energy and water utilities and Telecommunications Industry Rules specific to telecommunications carriers. Decision 07-01-024, D.07-09-018, D.07-09-019, and Resolution T-17327 clarified the General Rules and Telecommunications Industry Rules.

General Order 96-B authorized Staff to modify the Advice Letter process to accept electronic filings. Specifically, per G.O 96-B General Rule 7.1:

An Industry Division may accept the submittal of advice letters and related documents by electronic mail when the Division determines that it has the capacity to receive and process advice letters and related documents in this fashion.

On December 5, 2003, Resolution T-16807 authorized Communications Division (CD) to implement, among other things, an Advice Letter filing process by CD-ROM and to submit one paper copy of the Advice Letter summary form and cover sheet. On December 12, 2003, CD issued a notice to all telecommunications carriers to implement Resolution T-16807 requirements. This new filing requirement became effective as of January 5, 2004.

Although G.O 96-B authorized Staff modification of the Advice Letter filing process to accept electronic filings, it is appropriate for the Commission to issue a new Resolution that modifies the existing process memorialized in Resolution T-16807.³

Section 489 (a) of the Public Utilities Code requires telecommunications carriers to maintain tariffs on file with the Commission. Staff requests tariffed carriers to submit their tariff to CD annually on February 13, and the submitted tariff must be the version in effect as of January of the year that the annual tariff filing is submitted. If a carrier is detariffed completely, it is required to submit a letter to CD stating so on an annual basis. Staff directs carriers to mail a copy of their tariff on CD-ROM along with a cover letter to CD and to email a copy of the filing to CD.

General Order (G.O.) 104-A and Decision (D.) 93-02-019 require carriers subject the Commission's jurisdiction to file reports on their California operations annually. All annual reports are due March 31st of each year except for the Affiliated Transaction Report, which is due on May 1st of each year. The Annual Report filings should reflect operations for the prior calendar year. Staff directs carriers to mail a copy of their Annual Report filing on CD-ROM along with a hard copy to CD, and to email a copy of the filing to CD.

³ PU Code 1708

Current Filing Requirements

Under the current filing process, paper and CD-ROM Advice Letter copies are mailed to CD's Advice Letter Coordinator. In addition, carriers must email the Advice Letter to CD via TD._PAL@cpuc.ca.gov. Once CD receives the mailed copy, the contents of the CD-ROM is uploaded and saved electronically.

To allow for public notice, carriers must also e-mail Advice Letters to the appropriate CD Advice Letter service list on or before the date the carrier submits the Advice Letter to CD.⁴ Advice Letter service lists are maintained on the CD section of the CPUC's website and are available for download.⁵ Each carrier is also required to maintain at least one Advice Letter service list so that interested parties can request and receive Advice Letters.⁶ The utility is responsible for emailing a copy of the advice letter to all parties on the service list.

Paper and CD-ROM copies of the Annual Tariff and Annual Report filings are mailed to CD. An electronic copy is also emailed to CD via CDCompliance@cpuc.ca.gov. Once the CD receives the mailed copy, the contents of the CD-ROM is uploaded and saved electronically.

DISCUSSION

As of September 2019, approximately 540 carriers are required to submit Advice Letters, Annual Tariffs, and Annual Report filings. CD receives over 5,000 Advice Letter filings and over 1,200 Annual Tariff and Annual Report filings per year. It has become increasingly cumbersome to process, store and maintain the large magnitude of paper and CD-ROM copies of the Annual Tariff and Annual Report filings.

The current filing process is inefficient, time consuming, and wasteful for staff, carriers, and interested parties. In the approximately 15 years since Resolution T-16807 was implemented, CD-ROM technology has become outdated. Many new computers no longer have a CD-ROM drive. Recognizing that CD-ROM technology has become obsolete, Staff recently experimented with accepting submission of Annual Tariff filings via USB flash drive. Staff, therefore, recommends modernizing the Advice Letter filing process to eliminate both the CD-ROM and paper filing requirements, and to institute

⁴ G.O.96-B Telecommunications Industry Rule 10; G.O.96-B General Rule 4.3

⁵ <https://ia.cpus.ca.gov/alsl/getlist.aspx>

⁶ G.O.96-B General Rule 4.3

an electronic-only filing method. An electronic filing process would result in more efficient Advice Letter filing and processing, be more environmentally friendly, and be less wasteful.

Staff studied the current filing process to determine areas that can be improved, researched advice letter filing processes used by another division, and performed electronic only advice letter filing simulations. The simulations (via email only) were successful and demonstrated that an electronic only filing process has the potential to increase efficiency and reduce waste not only for the Commission but also for the Commission's external stakeholders. Staff, therefore, recommends that all telecommunications carriers submit filings via email. To acknowledge future potential technological changes, Staff further recommends that the Commission authorize CD in the future to direct carriers to submit filings via an alternate electronic filing method.

The proposed Instructions for Advice Letter Related Filings are attached to this Resolution as Appendix A. The proposed Annual Tariff and Annual Report Filing Processes are attached to this Resolution as Appendix B. Staff recommends that the revised filing process take effect on January 1, 2020 to give carriers an opportunity to familiarize themselves with the new requirements.

Advice Letter and Annual Report filing process modifications like those proposed here and the instant modification (from CD-ROM technology to an electronic only filing method) are changes that may be made by Staff after this Resolution is approved. (See D.02-02-049, Order Modifying Resolution M-4801 and Denying Rehearing.) Therefore, Staff recommends the Commission grant it the discretion to make future revisions to the Advice Letter filing and Annual Report filing processes (including updated filing instructions) via Administrative Letters sent to carriers via email and/or posted on the CPUC's public website at least 30 calendar days prior to implementation. This flexibility will allow Staff to work directly with carriers and other interested parties and will streamline Advice Letter and Annual Report filing process revisions.

SAFETY IMPACT

There are no specific safety issues in this resolution.

COMMENTS

In compliance with PU Code § 311 (g), a Notice of Availability was e-mailed on October 7, 2019 to all telephone corporations informing these parties that the draft of this Resolution is available at the Commission's website <http://www.cpuc.ca.gov/> and is available for public comments. In addition, CD informed these parties that the

subsequent conformed Resolution, when adopted by the Commission, will be available at the same Commission's website

Notice of Draft Resolution T-17670 was published in the Commission Daily Calendar on October 8, 2019.

On October 28, 2019 AT&T submitted comments on the Draft Resolution. In its comments AT&T asserts that the 2:00 PM Pacific Standard Time (PST) submission cut off time for advice letters, protests, and responses in Appendix B contradicts Rule 1.15 of the Commission's Rules of Practice and Procedure, which sets the submission cut off time to be considered filed same day at 5:00 PM PST. Staff has modified the Resolution to revise the submission cut off time to 5:00 PM PST.

CONCLUSION

The Commission finds it reasonable to approve modifications to the Communications Division's Advice Letter filing process, to eliminate the CD-ROM and hard copy filing requirements, and to implement electronic only filing. The Commission also finds it reasonable to extend the electronic only filing requirement to Annual Tariff and Annual Report filings. Finally, the Commission authorizes Staff to make future changes and/or updates to these filing requirements to align them with changes in technology or to otherwise improve process efficiency. Staff is authorized to inform carriers of filing process changes via Administrative Letter.

FINDINGS

1. The Commission uses Advice Letters to informally dispose of ministerial and noncontroversial utility requests.
2. Advice letters are submitted in compliance with Commission Decisions and Orders, to make changes to carrier information, to file an agreement, or to request tariff change approval.
3. On December 5, 2003, Resolution T-16807 instituted the CD-ROM requirement for Advice Letter filings and proposed modifying the paper filing requirements. The new filing requirements became effective on January 5, 2004.
4. Pursuant to Section 489 (a) of the Public Utilities Code, telecommunications carriers are required to file tariffs. Tariffed carriers are requested to submit their tariff to CD annually.
5. Pursuant to General Order 104-A and Decision 93-02-019, all carriers subject to the jurisdiction of the Commission are required to file reports on their California

operations. Affiliated Transaction Reports are due by May 1 of each year. The remaining Annual Reports are due by March 31 of each year.

6. General Order 96-B governs matters submitted to the Commission outside a formal proceeding including Advice Letter submission.
7. General Order 96-B includes General Rules and Telecommunications Industry Rules.
8. Decision (D.) 07-01-024, D.07-09-018, D.07-09-019, and Resolution T-17327 clarified the General Rules and Telecommunications Industry Rules.
9. General Order 96-B authorized Staff to modify the Advice Letter process to accept electronic filings.
10. Paper and CD-ROM Advice Letter copies are currently mailed to the Communications Division's Advice Letter Coordinator. The Advice Letter is also emailed to the Communications Division.
11. The paper, CD-ROM, and email filing process has also been applied to Annual Tariff and Annual Report filings.
12. Advice Letters must be emailed to the appropriate service list to allow for public notice.
13. Service lists are maintained on the Communications Division section of the Commission's website and are available for download. Carriers are also required to maintain at least one Advice Letter service list so that interested parties can obtain Advice Letters that they submit to the Communications Division.
14. The Communications Division receives over 5,000 Advice Letter filings and over 1,200 Annual Tariff and Annual Report filings per year.
15. The current filing process is cumbersome, inefficient, time consuming, and wasteful.
16. CD-ROM technology is outdated.
17. Staff's simulation of electronic only advice letter filings has been successful and has increased efficiency.
18. Staff recommends that beginning on January 1, 2020 all telecommunications carriers submit filings for advice letters, annual tariffs and annual reports via email or via an alternate electronic filing method as Staff directs in the future.
19. Staff recommends that the Commission grant Staff the discretion to make future Advice Letter filing process revisions via Administrative Letters sent to carriers

via email and/or posted on the California Public Utilities Commission (CPUC or Commission) public website at least 30 calendar days prior to implementation

THEREFORE, IT IS ORDERED that:

1. The Communications Division's Advice Letter, Annual Tariff, and Annual Reports filing processes are modified to:
 - a. Eliminate the CD-ROM and hard copy filing requirements; and
 - b. Implement electronic only filing via email or an alternate method Staff may direct in the future through an administrative letter.
2. The Commission authorizes Staff to make future Advice Letter, Annual Tariff and Annual Report filing process revisions as set forth in this Resolution.
3. Staff shall inform carriers of filing instructions and future filing process revisions via Administrative Letter sent by email and posted on the California Public Utilities Commission (CPUC or Commission) public website at least 30 calendar days prior to implementation

This Resolution is effective today.

I hereby certify that the California Public Utilities Commission adopted this Resolution at its regular meeting on November 7, 2019. The following Commissioners approved it:

/s/ ALICE STEBBINS

Alice Stebbins
Executive Director

MARYBEL BATJER
President
LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
Commissioners

Appendix A
Annual Tariff and Annual Report Filing Processes

Table 1: Annual Tariffs: Electronic Submission Process Requirements*

* Carriers must comply with one of the above filing requirements.

Annual Tariff Filing	All Local Exchange Carriers and Interexchange Carriers that are Tariffed	All Local Exchange Carriers and Interexchange Carriers that are Detariffed Completely	Email Address to Send Reports to
A Cover Letter along with a copy of the company's tariff as of January 1 (Due in February of each year).	Yes	No	CDCompliance@cpuc.ca.gov
A letter stating the carrier is detariffed completely	No	Yes	CDCompliance@cpuc.ca.gov

The corporate identification number assigned to the carrier must be included in the email subject line of all filings along with the carrier's name and the name of the report submitted.

Table 2: Annual Reports: Electronic Submission Process Requirements

Annual Report	Uniform Regulatory Framework (URF) Incumbent Local Exchange Carriers (ILEC)	General Rate Case (GRC) Incumbent Local Exchange Carriers (ILEC)	All URF Competitive Local Exchange Carriers and All Interexchange Carriers (wholesale and resellers)	Commercial Mobile Radio Services (CMRS), Personal Communications Carrier (PCC), Radio Telephone Utility (RTU)	Email Address to Send Reports to
FCC ARMIS Reports (due March 31) a) FCC Report 43-01, the Annual Summary Report b) FCC Report 43-02, the USOA Report c) FCC Report 43-03, the Joint Cost Report d) FCC Report 43-07, the Infrastructure Report e) FCC Report 43-08, the Operating Data Report	Yes	No	No	No	CDCompliance@cpuc.ca.gov
Affiliated Transaction Report (due May 1) <ul style="list-style-type: none"> R.92-08-008 - Rulemaking which adopted affiliate transaction reporting requirements and report templates D.93-02-019- Decision which made certain revisions to the Rulemaking 	Yes	Yes	Yes	Yes	CDCompliance@cpuc.ca.gov
Selected Financial Data (due March 31)	No	Yes	No	No	CDCompliance@cpuc.ca.gov
Annual Report on Operations using the FCC Form M format (due March 31)	No	Yes	No	No	CDCompliance@cpuc.ca.gov
Operational and Financial Information Report (due March 31)	No	No	Yes	No	CDCompliance@cpuc.ca.gov

The corporate identification number assigned to the carrier must be included in the email subject line of all filings along with the carrier's name and the name of the report submitted.

Appendix B
Instructions for Advice Letter Related Filings

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A. Proposed Carrier Advice Letter Submission Instructions

Step 1. Prepare the Advice Letter (AL) [Original or the Supplement]

1.1 AL summary form

Complete the AL summary form (in Portable Document Format (PDF) format and PDF/A compliant).

- a. A carrier's AL filing must be numbered sequentially, beginning with number 1 for the first AL filed. The carrier may send an email to TD._PAL@cpuc.ca.gov to verify or request information about the next available number to be used in the AL filing.
- b. If filing a supplement, use the same AL number of the original filing and affix the letter "A", "B", "C" and so on after the number. e.g. AL5A [for the first supplement] or AL5C [for the third supplement]

1.2. Cover sheet

Complete the cover sheet for the AL filing (in PDF format and PDF/A compliant). Failure to submit a complete AL cover sheet may result in Communications Division (CD) rejecting the AL filing. The AL cover sheet must state in a narrative format the following:⁷

- a. Date AL submitted to the CD
- b. Date the AL is served to the appropriate parties
- c. Language that says "protest or response to the AL must be submitted to CD within 20 days of the AL's date of submission and served on the carrier on the same day"
- d. Requested effective date
- e. Service(s) affected (if any) by the AL
- f. CPUC orders, codes or other statutory provisions (by section) related to the substance of the AL

1.3. Supporting documents

Attach the supporting documents (in PDF format and PDF/A compliant) to the AL cover sheet. Supporting documents vary by type and tier level of an AL. For example, a copy of the bond must be included in an AL filing for performance bond compliance (Tier 1 AL).

Step 2. Prepare the service list

2.1. Service list

All AL filings (including supplements) must be served on the appropriate service list. The carrier should use one of the following six service lists available at <https://ia.cpus.ca.gov/als/getlist.aspx>:

- a. AL for changes in rates, terms and conditions of service, or new service

⁷ G.O 96-B General Rule 4.6

- b. AL for eligible telecommunications carrier designation requests
- c. AL for general rate case filings
- d. AL for facility construction filings
- e. AL for negotiated inter connection agreements pursuant to Industry Rule 8.1 and contracts for tariffed services pursuant to Industry Rule 8.2
- f. AL not fitting within the preceding categories

Select the proper list, download and save it in Excel format. Use the Excel file to copy and paste email addresses into email recipient field.

Convert the downloaded service list to PDF format and save. Include the PDF in the supporting documents.

Step 3. Ensure documents follow these file naming conventions

3.1. PDF format

- a. All AL/supplement files (AL summary form, cover sheet, service list, supporting documents and supplement) must be submitted in PDF format.
- b. Exception: If submitting shapefiles or spreadsheets, carrier should submit both the shape file/Excel file and a PDF copy.

3.2. PDF/A compliance

- a. PDF/A is a format that ensures long-term archiving and reproduction of PDF documents. This ensures that PDF documents are accessible and secure for the long-term.
- b. For Adobe Acrobat, step by step directions on how to achieve PDF/A compliance can be found [here](#).⁸ For Nitro, directions can be found [here](#).⁹

3.3. Attachment file name format

- a. For an Original AL filing:
 - Combine (in this order) AL summary form, cover sheet, service list and supporting documents into one PDF document.
 - Name the combined PDF file as:
[Utility Number] [Carrier Name] [AL Number]
e.g. 9999 XYZ Wireless AL5
- b. For an AL Supplement filing:
 - Combine (in this order) AL summary form, cover sheet, service list and supplemental documents into one PDF file.
 - Name the combined PDF file as:

⁸ <https://helpx.adobe.com/acrobat/using/pdf-x-pdf-a-pdf.html>

⁹ <https://www.gonitro.com/user-guide/pro/article/create-a-pdf-a-file>

[Utility Number] [Carrier Name] [AL # Letter] [Supplement]
e.g. 9999 XYZ Wireless AL5A Supplement

3.4. File size

- a. Email size limitations
 - i. To ensure delivery, CD is limiting the total file size per email to 5 MB.
 - ii. If attachments exceed 5 MB, the carrier must split the attachment into at least two files and send each file in a separate email. The total size of each email must be below 5 MB.
 - iii. If sending a multi-part email Indicate in the email's subject that it is part of a multi-part email (see 3.5 below).
 - iv. If sending a multi-part email, the summary form and cover sheet should be attached in the first email while the service list and supporting documents should be attached to subsequent emails.
- b. When it is **not possible** to send multi part emails, files will be accepted via sFTP.
 - i. Go to secure CPUC's sFTP site¹⁰
 - ii. If account has already been created, log in with credentials.
 - iii. To set up a new account click 'Need help signing in?' and create user profile.
 - iv. Once signed in, go to the "Mail" option (located on the left pane) and compose the email. Do not create a new folder, use email option only.
 - v. Attach your data (drag and drop) to the email.

3.5. Email subject format

- a. For an Original AL filing:

[Utility Number] [Carrier Name] [AL Number] [If Confidential, Indicate Confidential] [Part X of Y if Submitting Multi-Part Email]

e.g. 9999 XYZ Wireless AL5
e.g. 9999 XYZ Wireless AL5 Part 1 of 2
e.g. 9999 XYZ Wireless AL5 Confidential
e.g. 9999 XYZ Wireless AL5 Confidential Part 1 of 2
- b. For an AL Supplement filing:

[Utility Number] [Carrier Name] [AL Number-X] [If Confidential, Indicate Confidential] [Part X of Y if Submitting Multi-Part Email]

e.g. 9999 XYZ Wireless AL5A
e.g. 9999 XYZ Wireless AL5A Part 1 of 2
e.g. 9999 XYZ Wireless AL5A Confidential
e.g. 9999 XYZ Wireless AL5A Confidential Part 1 of 2

Use the same email subject format if sending via CPUC's sFTP.

¹⁰ <https://cpucftp.cpuc.ca.gov>

3.6. Email body

The body of the email must contain a brief summary describing the filing.

Step 4. Submit the Advice Letter (or supplement) filing via email

4.1. Submission

The cut off time to be considered filed the same day as submitted is 5:00 PM Pacific Standard Time (PST). Advice Letters or supplements submitted after 5:00 PM PST or on a non-business day will be considered filed the following business day.

- a. For the **public version** of an AL or supplement filing:
 - The AL filer or protestor must submit the filing via email to both **TD._PAL@cpuc.ca.gov** and to the appropriate service list (emails from the downloaded Excel file)
- b. For the **confidential version** of an AL or supplement filing:
 - The carrier must submit a separate email to **TD._PAL@cpuc.ca.gov only**.
 - The email must contain the confidential version of the AL or supplement along with the required confidentiality declaration. The filing must be submitted in accordance with the confidential document submission process outlined in [D.16-08-024](#).¹¹

4.2. Confirmation

Protesters and carriers will receive an automatic reply from **TD._PAL@cpuc.ca.gov** confirming the receipt of the filing.

¹¹ <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M184/K382/184382359.PDF>

B. Proposed Carrier Protest to Advice Letters and Response Instructions

Step 1. Prepare the letter of protest or reply to a protest and service list

1.1 Letter of protest and reply to a protest

Any person, groups or organization can protest or respond to an advice letter (AL) **within 20 days** of the AL's date of submittal. The grounds for protest are the following:¹²

- a. The utility did not properly serve or give notice of the advice letter.
- b. The relief requested in the advice letter would violate statute or Commission order or is not authorized by statute or Commission order on which the utility relies.
- c. The analysis, calculations, or data in the advice letter contain material errors or omissions.
- d. The relief requested in the advice letter is pending before the Commission in a formal proceeding.
- e. The relief requested in the advice letter requires consideration in a formal hearing or is otherwise inappropriate for the advice letter process.
- f. The relief requested in the advice letter is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require relitigating a prior order of the Commission.

A utility shall reply to each protest and may reply to any response **within five business days** after the end of the protest period. The protestant cannot reply to the utility's reply.

Step 2. Prepare the service list

2.1. Service list

All protests and replies must be served on the **same day** on the utility (by the protestants) and on the protestants (by the utility) respectively. They must also be served on the appropriate service list. The utility and protestant should use one of the following six service lists available at <https://ia.cpuc.ca.gov/alsl/getlist.aspx>:

- a. AL for changes in rates, terms and conditions of service, or new service
- b. AL for eligible telecommunications carrier designation requests
- c. AL for general rate case filings
- d. AL for facility construction filings
- e. AL for negotiated inter connection agreements pursuant to Industry Rule 8.1 and contracts for tariffed services pursuant to Industry Rule 8.2
- f. AL not fitting within the preceding categories

Select the proper list, download and save it in Excel format. Use the Excel file to copy and paste email addresses into email recipient field.

¹² G.O 96-B General Rule 7.4

Convert the downloaded service list to PDF format and save. Include the PDF in the supporting documents.

Step 3. Ensure documents follow these file naming conventions

3.1. PDF format

- a. All protests, responses and replies must be submitted in PDF format.
- b. Exception: If submitting shapefiles or spreadsheets, carrier or protestant should submit both the shapefile or Excel file and a PDF copy.

3.2. PDF/A compliance

- a. PDF/A is a format that ensures long-term archiving and reproduction of PDF documents. This ensures that PDF documents are accessible and secure for the long-term.
- b. For Adobe Acrobat, step by step directions on how to achieve PDF/A compliance can be found [here](#).¹³ For Nitro, directions can be found [here](#).¹⁴

3.3. Attachment file name format

- a. For a Protest:
 - Combine (in this order) protest and service list into one PDF file.
 - Name the combined file as:
[Utility Number] [Carrier Name] [AL #] [Protest by]
e.g. 9999 XYZ Wireless AL5 Protest by California Advocates
- b. For a Response to Protest:
 - Combine (in this order) response and service list into one PDF file.
 - Name the combined file as:
[Utility Number] [Carrier Name] [AL #] [Protest Response to] [By]
e.g. 9999 XYZ Wireless AL5 Protest Response to California Advocates by XYZ Wireless

3.4. File size

- a. Email size limitations
 - To ensure delivery, CD is limiting the total file size per email to 5 MB.
 - If attachments exceed 5 MB, the protestant must split the attachment into at least two files and send each file in a separate email. The total size of each email must be below 5 MB.
 - If sending a multi-part email Indicate in the email's subject that it is part of a multi-part email (see 2.5 below).

¹³ <https://helpx.adobe.com/acrobat/using/pdf-x-pdf-a-pdf.html>

¹⁴ <https://www.gonitro.com/user-guide/pro/article/create-a-pdf-a-file>

- b. When it is **not possible** to send multi part emails, files will be accepted via sFTP.
 - Go to secure CPUC's sFTP site¹⁵ (see Appendix B).
 - If account has already been created, log in with credentials.
 - To set up a new account click 'Need help signing in?' and create user profile.
 - Once signed in, go to the "Mail" option (located on the left pane) and compose the email. Do not create a new folder, use email option only.
 - Attach your data (drag and drop) to the email.

3.5. Email subject format

- a. For a Protest:
[Utility Number] [Carrier Name] [AL Number] [Protest by] [Protester's Name]
e.g. 9999 XYZ Wireless AL5 Protest by California Advocates
- b. For a Response to Protest:
[Utility Number] [Carrier Name] [AL Number] [Response to] [Protest by] [Protester's Name]
e.g. 9999 XYZ Wireless AL5 Response to Protest by California Advocates

3.6. Email body

The body of the email must contain a brief summary describing the filing.

Step 4. Submit the protest or response to protest via email

4.1. Submission

The cut off time to be considered filed the same day as submitted is 5:00 PM PST. Protests and responses submitted after 5:00 PM PST or on a non-business day will be considered filed the following business day.

- The protester and carrier must submit the filing via email to both **TD._PAL@cpuc.ca.gov** and to the appropriate service list (emails from the downloaded Excel file).
- Protests must also be submitted to the carrier.
- Responses to protests must also be submitted to the protester.

4.2. Confirmation

Protesters and carriers will receive an automatic reply from **TD._PAL@cpuc.ca.gov** confirming the receipt of the filing.

¹⁵ <https://cpucftp.cpuc.ca.gov>